

Before The
POSTAL RATE COMMISSION
WASHINGTON, D.C. 20268-0001

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POSTAL RATE COMMISSION
OFFICE OF THE CONSUMER ADVOCATE

Classification and Fees For Confirm)

Docket No. MC2002-1

OFFICE OF THE CONSUMER ADVOCATE
INTERROGATORIES TO UNITED STATES POSTAL SERVICE
WITNESS PAUL BAKSHI
(OCA/USPS-T1-1-18)
May 1, 2002

Pursuant to Rules 25 through 28 of the Rules of Practice of the Postal Rate Commission, the Office of the Consumer Advocate hereby submits interrogatories and requests for production of documents.

If data requested are not available in the exact format or level of detail requested, any data available in (1) a substantially similar format or level of detail or (2) susceptible to being converted to the requested format and detail should be provided.

The production of documents requested herein should be made by photocopies attached to responses of these interrogatories. If production of copies is infeasible due to the volume of material or otherwise, provision should be made for inspection of responsive documents at the Office of the Consumer Advocate, 1333 H Street, N.W., Washington, D.C. 20268-0001, during the hours of 8:00 a.m. to 4:30 p.m.

If a privilege is claimed with respect to any data or documents requested herein, the party to whom this discovery request is directed should provide a Privilege Log (see, e.g., Presiding Officer Ruling C99-1/9, p. 4, in *Complaint on PostECS*, Docket No. C99-1). Specifically, "the party shall make the claim expressly and shall describe the

nature of the documents, communications, or things not produced or disclosed in a manner that, without revealing information itself privileged or protected, will enable other parties to assess the applicability of the privilege or protection.” Fed. R. Civ. P. 26(b)(5).

The term “documents” includes, but is not limited to: letters, telegrams, memoranda, reports, studies, newspaper clippings, speeches, testimonies, pamphlets, charts, tabulations, and workpapers. The term “documents” also includes other means by which information is recorded or transmitted, including printouts, microfilms, cards, discs, tapes and recordings used in data processing together with any written material necessary to understand or use such punch cards, discs, tapes or other recordings.

“All documents” means each document, as defined above, that can be located, discovered or obtained by reasonable diligent efforts, including without limitation all documents possessed by: (a) you or your counsel; or (b) any other person or entity from whom you can obtain such documents by request or which you have a legal right to bring within your possession by demand.

“Communications” includes, but is not limited to, any and all conversations, meetings, discussions and any other occasion for verbal exchange, whether in person or by telephone, as well as all documents, including but not limited to letters, memoranda, telegrams, cables, or electronic mail.

“Relating to” means discussing, describing, reflecting, containing, analyzing, studying, reporting, commenting on, evidencing, constituting, setting forth, considering, recommending, concerning, or pertaining to, in whole or in part. Responses to requests for explanations or the derivation of numbers should be accompanied by workpapers.

The term "workpapers" shall include all backup material whether prepared manually, mechanically or electronically, and without consideration to the type of paper used. Such workpapers should, if necessary, be prepared as part of the witness's responses and should "show what the numbers were, what numbers were added to other numbers to achieve a final result." The witness should "prepare sufficient workpapers so that it is possible for a third party to understand how he took data from a primary source and developed that data to achieve his final results." Docket No. R83-1, Tr. 10/2795-96. Where the arithmetic manipulations were performed by an electronic digital computer with internally stored instructions and no English language intermediate printouts were prepared, the arithmetic steps should be replicated by manual or other means.

Please especially note that if you are unable to provide any of the requested documents or information, as to any of the interrogatories, provide an explanation for each instance in which documents or information cannot be or have not been provided.

Respectfully submitted,


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OCA/USPS-1. The following questions refer to the USPS's capability to capture PLANET Code data.

- a. At page 4 of your testimony, you indicate that a "Confirm® data record is generated each time the PLANET Coded mail piece is run on certain Postal Service automated mail processing equipment." Please identify all automated mail processing equipment that can currently capture PLANET Code data.
- b. Are all USPS mail processing sites capable of capturing origination and destination PLANET Code data?
- c. If your response to part "b" of this interrogatory is other than affirmative, please identify all facilities that are unable to capture PLANET Code data. Include in your response the type of USPS facility listed – i.e. P&DC, AMF, BMC, SCF, etc.
- d. If your response to part "b" of this interrogatory is other than affirmative, please identify all 5-digit ZIP Code areas that are impacted by the inability of the USPS to capture PLANET Code data.
- e. Assume a hypothetical PLANET Coded letter is entered into the Postal System at a P&DC facility as a destination Confirm® mail piece. The destination of the hypothetical letter is a household outside of the delivery area of the entry point P&DC. Please identify the number of scans the mail piece is likely to receive by "certain USPS automated equipment" as well as the number of Confirm® records the hypothetical letter will generate.

- f. The following refers to Business Reply mail pieces. Please provide an estimate of the number of scans the average destination Confirm® Business Reply mail piece is likely to receive. If you are unable to provide an estimate, please explain.

OCA/USPS-2. The following questions refer to those facilities that are currently capable of capturing PLANET Code data.

- a. For all USPS mail processing sites that are capable of capturing PLANET Code data, how many are actually capturing the data?
- b. Please identify all mail processing sites that are capable of capturing PLANET Code data, but are not currently doing so.
- c. For each site identified in part "b" of this interrogatory, please identify all 5-digit ZIP Codes impacted.
- d. For each site identified in part "b" of this interrogatory, explain why the site is not currently capturing PLANET Code data. Please include in your response, the expected date upon which each site will begin capturing PLANET Code data.

OCA/USPS-3. Please provide a sample copy of a PLANET Code barcode. Are the data values used in a PLANET Code limited to numeric values? If not, please explain the types of data values permitted.

OCA/USPS-4. Please provide a sample copy of a PLANET Code barcode with a POSTNET barcode.

OCA/USPS-5. Your testimony at page 4 indicates that in October 1, 2001, the Postal Service began requiring mailers to submit an Advanced Shipping Notice (ASN) prior to or at the time of entering Destination Confirm® mailings.

- a. Please identify the process mailers used prior to October 1, 2001, and include all types of information previously gathered by the USPS.
- b. You indicate that the USPS requirement to use the ASN prior to or in conjunction with a Confirm® mailing allowed a new feature that enabled specific types of performance measurement and troubleshooting information to be provided. Please explain what the new performance and troubleshooting information is and to whom the information is provided.

OCA/USPS-6. The following questions refer to the location of a PLANET Code barcode in relation to a POSTNET barcode.

- a. How much latitude does the mailer have in placing the PLANET Code with the POSTNET barcode in order for the USPS mail processing equipment to read, collect and process a PLANET Coded mail piece?
- b. The Postal Service refers to PLANET Codes and POSTNET barcodes as a requirement of capturing PLANET Code data that is then provided to the mailer as a "flat file." In order to capture data, must the Postal Service have a POSTNET barcode placed on the mail piece at the time the mail piece is entered into the USPS mailstream? If so, please explain the data provided by the

POSTNET barcode. If not, please explain why the Postal Service requires the POSTNET barcode as a precondition to using a PLANET Code.

OCA/USPS-7. The following interrogatory is examining the requirement of whether or not the mailer must apply both a PLANET Code and POSTNET barcode to a mail piece prior to the letter and/or flat being entered into the USPS mailstream.

- a. If a mailer applied a PLANET Code to an automation compatible letter or flat, could the Postal Service subsequently apply its own POSTNET barcode to a mail piece and subsequently collect the same information as though the mailer had applied both the POSTNET barcode and the PLANET Code barcode?
- b. If your response to part "a" of this interrogatory is other than affirmative, please explain why not.
- c. If your response to part "a" of this interrogatory is affirmative, please provide the cost of having the Postal Service apply a POSTNET barcode to (1) a letter and (2) a flat.
- d. Is the Postal Service automated equipment currently capable of applying both a POSTNET barcode and a PLANET Code to (1) a letter and (2) a flat. If not, please explain why the equipment is incapable of applying both.
- e. If the Postal Service's automation equipment is capable of applying both a POSTNET barcode and a PLANET Code to a mail piece, please provide the cost of applying both codes to (1) a letter and (2) a flat.

OCA/USPS-8. Please provide a small sample file of USPS Confirm® Origin data records and a small sample file of USPS Destination Confirm® data records similar to that provided to PLANET Code users and referred to in your testimony as “comma-delimited flat file[s].” When providing the sample data files of Confirm® records, please provide files containing at least 10 records and no more than 50 records. Include in your response a complete description of each comma-delimited field.

OCA/USPS-9. Can the PLANET Code mailer currently view his/her individual Confirm® data records from the Postal Service Confirm® website?

- a. If so, please provide a copy of the screen displays available to the user when viewing data records from the Postal Service’s Confirm® website.
- b. If the data records cannot be currently viewed by PLANET Code mailers, please explain and provide copies of the screens that are available to the mailer when the Postal Service’s Confirm® website is accessed by a participating mailer.

OCA/USPS-10. With regard to information collected from PLANET Codes, what data is the Postal Service currently collecting for its own use? Please identify (1) the types of information that are collected, (2) the extent to which the information is being collected and (3) which facilities are collecting the information. For example: all mail processing facilities are collecting “x, y and z” data on every Confirm® mail piece.

- a. Please provide a sample copy of each data report generated by the Postal Service for use in analyzing PLANET Coded mail.

- b. If your response to this interrogatory is that the Postal Service is not collecting and analyzing the data, please explain why not.

OCA/USPS-11. At page 3 of your testimony, you indicate that “[t]he first two digits of the PLANET Code represent service type – Destination or Origin Confirm.®.” Please provide a list of all the 2-digit PLANET Codes and include in your response a description of the logic used to assign the first 2-digit PLANET Codes to a particular service type. For example, the first digit identifies Origin or Destination and the second digit identifies the service type.

OCA/USPS-12. At page 3 of your testimony, you indicate that an Origin Confirm® mailer can use all nine of the remaining digits to identify the mail piece as they choose. For an Origin Confirm® mail piece, how does the Postal Service know which mailer is to receive the USPS scanned “flat data file?”

OCA/USPS-13. Please refer to your testimony at page 3 where you state, “Within the Planet Code, mailers embed a postal assigned ID Code and their own information so that their mail pieces can be tracked.” Subsequently, on lines 22-3 of that same page of testimony you note that five digits are set aside for the Destination Confirm® mail piece ID Code.

- a. Why has the Postal Service limited the maximum number of customer ID codes to a theoretical maximum of 100,000 (including 00000).

- b. If the maximum number of ID codes is not limited to 100,000, please explain what the maximum number is and how the Postal Service has been able to overcome an apparent 100,000 limit.
- c. Please explain how the limited number of ID Codes may affect the total number of potential Confirm® mailers.
- d. Is it feasible for the postal automation equipment used in scanning POSTNET and PLANET Code barcodes to recognize alpha-numeric values? If not, please explain why not.

OCA/USPS-14. Please refer to your testimony at page 2, lines 17 through 19, where you indicate, "Confirm® is designed to meet the needs of many types of mailers, but particularly those of large-volume national mailers that have a need to improve their mail-related business processes or refine their customer data."

- a. Please explain why Confirm® is not also particularly useful to smaller local commercial mailers mailing a few thousand letters or reply letters to improve mail-related business processes or refine customer data.
- b. Please provide any Postal Service documents discussing or stating the reasons Confirm® was targeted to large national customers and/or why it was not targeted to smaller commercial customers.

OCA/USPS-15. On page 5 of your testimony, you state the "mail acceptance personnel will scan the barcode using the Delivery Confirmation hand-held scanners when they accept the mail." This will start the clock on the measuring process. Are the hand-held scanners used by the Postal Service mail acceptance personnel the same type of scanners that carriers use to scan a Delivery Confirmation mailpiece?

OCA/USPS-16. Please provide a hardcopy application form given to customers wishing to participate in the Confirm® program.

OCA/USPS-17. Please explain how customers wishing to apply for the Confirm® service locate the on-line application form.

OCA/USPS-18. Are delivery confirmation hand held scanners capable of reading a PLANET Code barcode and a POSTNET barcode? If not, can the scanners be reprogrammed to read a PLANET Code barcode and a POSTNET barcode? Please explain.

CERTIFICATE OF SERVICE

I hereby certify that I have this date served the foregoing document upon all participants of record in this proceeding in accordance with Rule 12 of the rules of practice.

Respectfully submitted,


Kenneth E. Richardson

Washington, D.C. 20268-0001
May 1, 2002